

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

NATIONAL CREDIT ADJUSTERS, LLC,

Plaintiff,

COURT FILE NO.: 1:15-cv-00861

v.

CRED X DEBT RECOVERY, LLC,
JAMES SAUER, JEFFREY SCHULTZ,
RICHARD SCHULTZ, AND JOHN
DOES 1-10

Defendants.

MOTION FOR EXTENSION OF TIME

Plaintiff, National Credit Adjusters, LLC, hereby moves the Court for an extension of time in which to file a brief and supporting documents in regard to its motion pursuant to Federal Rule of Civil Procedure 55(b) and Local Rule 55(b) to enter default judgment in favor of the Plaintiff and against the Defendants; Cred X Debt Recovery, LLC, James Sauer, Jeffrey Schultz, and Richard Schultz. Such documentation is currently due on August 17, 2017.

Counsel for the Plaintiff is a solo practitioner who is representing another long-term client in an action by the Federal Trade Commission and New York Attorney General where a Temporary Restraining Order and Preliminary Injunction were interposed and have required days in court and in document production. In addition, plaintiff's counsel is in the middle of a contentious divorce proceeding which has taken him away from his other clients. Accordingly,

Plaintiff request an additional 30 days in which to submit its brief and supporting documents in regard to its Motion for Default Judgment.

Respectfully submitted,

s/ David G. Peltan
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CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2018, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system. In addition, copies are being sent via email to their counsel, Michael Benson.

s/ David G. Peltan
David G. Peltan, Esq.
Attorney for Plaintiff